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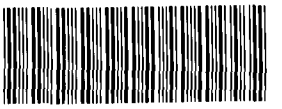
established 1959



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February 22, 1995
2510-95/21

Ms. Laura Brooks
EG&G Rocky Flats, Inc.
P.O. Box 464, Bldg. 080
Golden, Colorado 80402-0464

Subject: Determining Groundwater Treatment ARARs for OU 7
(MTS Contract 353017TB3)

Dear Ms. Brooks:

Laurie Peterson-Wright of EG&G asked Stoller to coordinate with you regarding the ARARs for OU 7. There are several discrepancies between Stoller and EG&G's respective analyses of ARARs for OU 7. These discrepancies need to be resolved as soon as possible to finalize OU 7 ARARs. Chemical-specific ARARs identified in EG&G's ARARs report will be used for the ARARs analysis for groundwater that Stoller is preparing as part of the IM/IRA decision document.

One broad issue that has not been addressed is the degree to which legal requirements may apply to one aspect of remediation but not another. For example, while LDRs are probably not an ARAR for sediment and soils, they could be an ARAR for leachate/seep/groundwater treatment. EG&G should ensure that descriptions of site-specific ARARs for OU 7 also identify the media affected by the requirement. If and when LDRs may apply may also need to be discussed.

For chemicals that do not have any associated federal or state ARARs EG&G has recommended setting the proposed performance standard at ten times detection limits. Is there regulatory guidance for using this number? Other methods for setting performance standards may include risk-based performance levels and established background levels.

Colorado groundwater standards were not used for EG&G's proposed performance standards for seep from the landfill being transported to OU 1. This decision was appropriate, but leads to the question of how groundwater standards are being addressed for contaminants that are migrating from seep water into groundwater at OU 7.

There are additional state surface water standards that have not yet been considered as an ARAR because acceptable concentration levels depend on the water's hardness (See 5 CCR 1002-8 §3.8 and § 3.1.11). Stoller is planning to use existing data in RFEDS to determine if any of these standards should be considered.

The S.M. Stoller Corporation 5700 Flatiron Parkway Boulder, Colorado 80301-5718 303-449-7220

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Steve Franklin had specific questions (which he discussed on the phone with you) about how standards were selected for some of the potential contaminants of concern. The following table summarizes these questions.

Chemical Name	EG&G ARAR	Stoller ARAR	Comment
Antimony	.014 (State SDWA MCLs)	.006 (Federal SDWA MCL)	Not the most stringent number.
Iron	13.2 (Segment 4 & 5 Surface water standard)	.3 (Federal secondary drinking water standard, et. al.	Not the most stringent number.
Manganese	1.0 (Segment 4 & 5 Surface water standard)	.05 (Federal secondary drinking water standard, et. al.)	Not the most stringent number.
Gross Beta	4 mrem per year	5 pci/L (Segment 4 & 5 Surface water standard)	mrem measurements are radiation exposure limits, not a cleanup standard. Stoller converted this dose limit to a cleanup standard of 8 pci/L. 5 pci/L was then selected because it was more stringent.
Trichloroethene	.066 (Segment 4 & 5 Surface Water Std.)	.0027 (State Water Quality Standard)	Not the most stringent number.
Acenaphthene	.01 (PQL)	.52 (Colo. Basic Water Quality Standard)	Segment 4 & 5 standards of 0.0028 is for acenaphthelyene, not acenaphthene. The most stringent number among the remaining standards was above the PQL so Stoller did not select the PQL as a potential cleanup standard.

All units are in mg/L unless otherwise noted

Please feel free to call Steve Franklin or me with any questions and let us know when you are available for further discussions.

Sincerely,

David M. Garcia
Steve Franklin
Regulatory Specialists

cc:	L. Peterson-Wright	EG&G
	M. Vaag	Stoller
	M. Eisenbeis	Stoller
	L. Ross w/o	Stoller
	B. Stephanus w/o	Stoller
	MKV Chron w/o	Stoller
	OU 7 Project File	